

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

FINAL

Title V, Construction / Operating

Permit: V-04-059 R2

Novelis Corporation

Berea, Kentucky 40403

September 6, 2008

Luis D. Fuentes, Reviewer

SOURCE I.D. #: 21-151-00043

SOURCE A.I. #: 2798

ACTIVITY #: APE20080003

MINOR PERMIT REVISION V-04-059 R2:

On April 15, 2008 Novelis Corporation submitted an application for installing an auxiliary shredder machine (rotogrind unit). The new equipment will take scrap aluminum, shred it, and convey this raw material to one or more of the four side well furnaces. 40 CFR 63 Subpart RRR, Secondary Aluminum Production NESHAP applies to the particulate matter emissions from the existing and proposed shredders. A new baghouse will control particulate generated at the rotogrind unit and the convey system to meet the emission limit. The potential to emit from this process will result in 5.63 tons per year (tpy) of particulate matter (PM). This emission level is below the prevention of Significant Deterioration of air quality (PSD) threshold of 15 tpy for particulate matter less than 10 microns (PM₁₀).

MINOR PERMIT REVISION V-04-059 R1:

On January 18, 2006 Novelis Corporation submitted an application to modify its existing permit #V-04-059. The facility plans to install a third sow preheater with no increase in sows (cold metal) processed through the sow preheater units. The new sow preheater unit has much better insulation, a new low-NO_x burner system, and will replace the older units once the new unit is commissioned. This unit will use only natural gas.

In performing this review, an administrative error regarding the emission limitations on page 33 of the permit was discovered. The referenced page was revised to reflect the new sow preheater (#3) and corrected emission limitations. All previously reviewed operating, emission, monitoring and record keeping requirements were maintained.

SOURCE DESCRIPTION:

The Novelis Corporation in Berea, KY operates a secondary aluminum recycling facility. The facility conveys scrap aluminum through a series of process units that include a debaler, two scrap aluminum beverage can shredder, two decoaters, four sidewall furnaces each with an attached main melter, two hold furnaces, and one cold cast process unit. The current facility production of cold cast

aluminum is 380,980 tons per year.

COMMENTS:

The new shredder process is identical to the existing two shredders; therefore all current applicable requirements for these two units also apply for the new equipment including applicable regulations, testing, monitoring, measuring, recording, and reporting.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.